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**TSCA NON-CONFIDENTIAL BUSINESS INFORMATION**

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8EHQ-03-15339	89110000503	9/14/11

COMMENTS: COMMUN S (DECLASS)

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2011 SEP 14 AM 11:49

Andrea V. Malinowski  
Corporate Counsel

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September 13, 2011

**VIA FEDERAL EXPRESS**

Attn: TSCA Declassification Coordinator  
U.S. Environmental Protection Agency  
Office of Pollution Prevention and Toxics  
Confidential Business Information Center (CBIC)  
EPA East Building, Room 6428  
1201 Constitution Avenue  
Washington, D.C. 20004-3302

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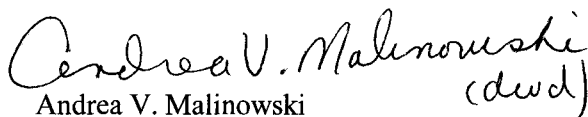
**Re: Declassification Activity - TSCA §8(e) Submission**  
**Originally Assigned 8EHQ Number: 8EHQ-03-15339 (letter dated 05.15.03)**  
**Originally Assigned Bar Code: 88030000134**  
**Supplemental Submission - Revised Public Copy of Submission**

Dear TSCA Declassification Coordinator:

The above-identified TSCA §8(e) submission was reviewed in connection with the EPA 2010 CBI Declassification Challenge initiative. For that submission only, it was determined that the confidential business information (CBI) claims may be withdrawn.

Please find enclosed a revised public copy of the above-identified submission. The originally assigned 8EHQ number has been added by the submitter to the first page of the enclosed revised public copy of the submission. Please note that by withdrawal of the CBI claims, DuPont is not relinquishing any property rights to the study in issue.

Very truly yours,

  
Andrea V. Malinowski (dwd)

Enclosure



**CONTAINS NO CBI**



PUBLIC COPY

DuPont Haskell Laboratory  
for Health and Environmental Sciences  
Elkton Road, P.O. Box 50  
Newark, DE 19714-0050

May 15, 2003

Via Federal Express

~~CONFIDENTIAL BUSINESS INFORMATION~~

Document Processing Center (Mail Code 7407M)  
Room 6428  
Attention: 8(e) Coordinator  
Office of Pollution Prevention and Toxics  
U.S. Environmental Protection Agency, ICC Building  
1201 Constitution Ave., NW  
Washington, DC 20460

Dear 8(e) Coordinator:

Phosphonium, tetrabutyl-, salt with 1,1,2,2,3,3,4,4,4-nonafluoro-1-butanefluorobutanesulfonic acid (1:1)  
CAS Registry Number 220689-12-3  
Generic Name: Phosphonium salt of substituted alkylsulfonate

This letter is to inform you of the results of a recently conducted four-week study in rats with a four-week recovery period with the above referenced test material. This study was sponsored by General Electric Company and DuPont, and this letter is being provided on behalf of both companies.

Groups of male and female rats (13/sex/dose) were administered 0, 5, 50, or 200 mg/kg/day of the test material by oral gavage. Body weight, food consumption, detailed clinical observations, neurobehavioral and clinical pathology parameters were evaluated in all rats. Eight rats/sex/dose were sacrificed and necropsied at the end of the dosing period. Microscopic evaluation was conducted on all tissues from control and high-dose rats and on nasal tissue from low- and intermediate-dose rats. The remaining 5 rats/sex/dose were held without dosing for a four-week recovery period. Microscopic evaluation was conducted on nasal tissue from all recovery group rats.

No adverse test material-related effects were observed on any body weight, nutritional, neurobehavioral, or clinical pathology parameters in any dose group. Minimal to moderate focal degeneration/regeneration of the olfactory epithelium of the nose was present in male and female rats dosed with 50 mg/kg/day and above at the end of the dosing period. The incidence of this lesion was 5/8 and 4/8 in males and females, respectively, dosed with 200 mg/kg/day, and 4/8 and 3/8 in males and females, respectively, dosed with 50 mg/kg/day. At the end of recovery, a few intraepithelial cysts were observed in 4/5 and 3/5 male and female rats, respectively, in the 200 mg/kg/day group, and in 3/5 and 1/5 male and female rats, respectively, in the 50 mg/kg/day group. These cysts were considered to accompany late-stage regrowth of the olfactory epithelium, indicating recovery was almost completed. No similar effects were observed at the end of the dosing or recovery periods in male or female rats dosed with 5 mg/kg/day.

The nasal lesions observed in this study were generally of a mild nature and do not represent a unique lesion, as similar lesions have been observed in other rat oral gavage studies. Consistent with the known regenerative capacity of olfactory epithelial tissue, the architecture was re-established by the end of the recovery period in the dose groups affected. Although olfactory lesions were seen in rats dosed with the two highest levels, a clear no-adverse effect level was established.

Under these experimental conditions, the pathological changes described above appear to be reportable, based upon EPA guidance given in the EPA TSCA Section 8(e) Reporting Guide (June, 1991).

~~Substantiation of our confidentiality claim is enclosed.~~

Sincerely,

A handwritten signature in cursive script, reading "A. Michael Kaplan".

A. Michael Kaplan, Ph.D.  
Director - Regulatory Affairs and Occupational Health

AMK/JCS/SAM:clp  
(302) 366-5260

cc: Dean Branson, Ph.D.  
Product Stewardship Manager  
General Electric Company  
1 Lexan Lane  
Mt. Vernon, IN 47620

From: (302) 773-0071  
Doris Duffy  
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**Washington, DC 20004**

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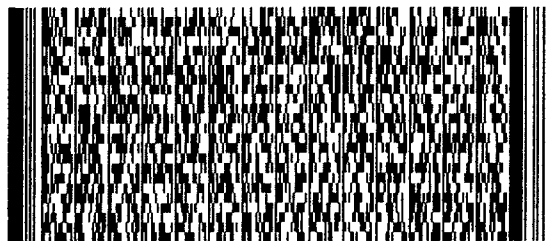
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